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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 20, 2001

Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: Amendment of TV Table of Allotments
Owensboro, Kentucky
Facility Identification Number 127422

Dear Ms. Salas:

Transmitted herewith, on behalf of Pappas Telecasting of America, A California Limited Partnership, and South Central Communications Corporation, are an original and four copies of their "Petition for Reconsideration" with regard to dismissal of the above-referenced petition for rule making to substitute a modified channel for the channel previously allotted at Owensboro, Kentucky.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Anne Goodwin Crump

Counsel for Pappas Telecasting of America,
A California Limited Partnership

Enclosures
AGC:st

cc: Clay Pendarvis, Chief, Television Branch (with enclosure) **By Hand Delivery**

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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DEC 20 2001

In the Matter of

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Amendment of Section 73.606(b),
TV Table of Allotments, TV Broadcast Stations.
(Owensboro, Kentucky)

MM Docket No. _____
RM No. _____
Facility ID No. 127422

Directed to: Chief, Television Branch
Video Services Division, Mass Media Bureau

PETITION FOR RECONSIDERATION

Pappas Telecasting of America, A California Limited Partnership ("Pappas"), and South Central Communications Corporation ("SCCC"), by their respective attorneys, hereby respectfully petition for reconsideration of the dismissal of the above-captioned Petition for Rule Making to substitute Channel 47 for the existing Channel 48 allotment at Owensboro, Kentucky. With respect thereto, the following is submitted:

1. In 1996, Pappas and SCCC filed mutually exclusive application for construction permit for a first local commercial television station to operate on Channel 48 at Owensboro, Kentucky, as specified in the Commission's TV Table of Allotments (File Nos. BPCT-19960722KL and BPCT-19960920IV, respectively). Subsequently, on January 30, 1998, Pappas and SCCC filed a "Joint Request for Approval of Settlement Agreement" ("Joint Request"), seeking approval of their settlement agreement, the grant of Pappas's application, and the dismissal of SCCC's pending application. That agreement was filed pursuant to Section 309(l) of the Communications Act of 1934, as amended, which provided for a statutory settlement

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period. 47 U.S.C. §309(l). The Joint Request has remained pending before the Commission since then, for a period of almost four years.

2. During the pendency of the Joint Request, on November 22, 1999, the Commission released its *Public Notice*, "Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations," 14 FCC Rcd 19559 (1999). On July 14, 2000, Pappas and SCCC filed a "Petition for Rulemaking," in which they requested that the Commission substitute Channel 47 for Channel 48 at Owensboro. This substitution request was filed due to predicted interference from the allotted Channel 48 to a DTV Channel 52 allotment at Vincennes, Indiana, and a DTV Channel 48 allotment at Bowling Green, Kentucky. Attached to the "Petition for Rulemaking" was an engineering statement which demonstrated, using then-current interference prediction programs, that the proposed Channel 47 NTSC operation at Owensboro would not cause harmful interference to any other NTSC station, and would cause less than 0.5% interference to any digital station.

3. By letter of the Chief, Television Branch, dated November 20, 2001, Reference 2-A726 (the "Letter Ruling") the Commission's staff dismissed the "Petition for Rulemaking" to change channels. This action was based upon the findings that the proposed operation of Channel 47 would cause interference greater than 0.5% to the DTV allotment and outstanding construction permit for WAVE-DT, Louisville, Kentucky, and would also cause interference to Class A station W54AE, Paducah, Kentucky. This conclusion is erroneous, however, in that it is not based upon the current Pappas/SCCC proposal.

4. The Letter Ruling's analysis is based upon the assumption that the proposed Owensboro station would be operating on Channel 47. Such is not the case. On May 25, 2001,

Pappas and SCCC amended their rule making petition to request the substitution of Channel 57, rather than Channel 47, for the currently allotted Channel 48 (the “May 25 Amendment”). The Letter Ruling makes no mention whatsoever of this amendment, and apparently it was overlooked entirely. Clearly, the Commission’s staff is required to provide some response to, and indeed a reasoned disposition of, the amendment filed. As demonstrated in the Engineering Statement attached thereto, the May 25 Amendment completely resolves all interference issues. Accordingly, the stated basis for the dismissal of the “Petition for Rulemaking” no longer exists, as those issues were resolved by the amendment.

5. Good cause exists for acceptance of the May 25 Amendment to the “Petition for Rulemaking.” As stated above, the Pappas/SCCC petition as initially submitted included an engineering statement which showed that the proposed Channel 47 facility would not cause interference in excess of 0.5% to any DTV facility. As set forth in the attached declaration of Jim McPhetridge, this conclusion resulted from use of interference prediction software based upon the Commission’s OET Bulletin No. 69.

6. At that time, however, there was considerable uncertainty as computer software was developed to implement OET Bulletin No. 69. *See*, Exhibits 1 and 2. The software used by the Commission was not readily available to the public for its use in analyzing particular proposals. All parties were attempting to find methods to apply OET Bulletin 69, but the resulting software did not always yield consistent results. Moreover, in the interim since that time, the Commission’s software also has developed. The program now used to predict interference uses different rounding mechanisms, which can yield different results. Thus, a proposed facility which previously was predicted to cause less than 0.5% interference to WAVE-DT now is

predicted to cause 0.7% interference to that station, a mere 0.2% above the allowable level.

7. The Pappas/SCCC “Petition for Rulemaking” was amended on May 25, 2001, however, in a manner which eliminates any need for concern over this discrepancy or the modification to the WAVE-DT construction permit. Clearly, it would be entirely inequitable to require Pappas/SCCC to have met the standards of an interference prediction program which had not yet been fully developed at the time that it filed its petition. The fundamental unfairness of such an approach is especially manifest in a case, such as the instant one, in which the discrepancy is so small. An examination of the facts makes it readily apparent that any errors made with regard to interference to the WAVE-DT allotment resulted from confusion existing at the time of the filing of the petition to change channels, and the current prediction of interference to that allotment results from computer programming developed fully only after the filing of the petition. Applicants and petitioners before the Commission are not required to be clairvoyant as to how Commission processes may develop in the future. Accordingly, due to the uncertainty at the time of filing and later developments in the methods of interference analysis, good cause existed for Pappas/SCCC to amend their “Petition for Rule Making” to rectify the situation.

8. The Letter Ruling also states that the Channel 47 proposal would be predicted to cause interference to Class A station W54AE. As set forth in the attached Engineering Statement of Sudhir K. Khanna, however, this statement is incorrect. *See*, Exhibit 2. Rather, as indicated therein, use of OET Bulletin 69 demonstrates that no prohibited interference would be caused to W54AE. In any event, this concern is rendered moot by the May 25 Amendment. As set forth above, Pappas/SCCC have amended their petition to specify operation on Channel 57 rather than Channel 47 or the original Channel 48. There was good cause for the filing of that amendment,

the amendment should be accepted, and the Table of Allotments modified accordingly.

9. Pappas and SCCC recognize that the Commission has recently acted to reallocate the spectrum which includes Channel 57. The text of the Commission's Report and Order in GN Docket No. 01-14 has not yet been released.¹ Nonetheless, the news release describing the actions taken indicates that the reallocation will allow the Pappas/SCCC rule making petition to go forward. *See, News, "FCC Reallocates and Adopts Service Rules for Television Channels 52-59,"* released December 12, 2001. That news release indicates that the Report and Order "dismisses pending petitions for new NTSC allotments in Channels 52-59...." *Id.* (emphasis added). The Pappas/SCCC rule making petition does not involve a requested new NTSC allotment, however, but rather seeks to modify an existing allotment. Pappas and SCCC filed applications for an existing, viable television channel in 1996, in accordance with the procedures established by the Commission, only to have that channel rendered unavailable by later Commission actions. Since the filing of their applications, Pappas and SCCC have entered into a settlement agreement to remove the mutual exclusivity between themselves and also have attempted to substitute a modified channel to provide service to the community of Owensboro.

10. Because a settlement is involved, once the change in channel is approved, then the Commission could proceed immediately with grant of a construction permit for the proposed new station. That station would represent the first local commercial television service for the community of Owensboro. Providing such local service has always been a high priority with the Commission. *See, e.g., Sixth Report and Order on Television Allocations*, 41 FCC 148 (1952).

¹ As the text is not yet available, Pappas and SCCC may supplement this Petition after its release to take into account matters set forth therein.

Indeed, as recently as the Commission Open Meeting at which the Report and Order in GN Docket No. 01-14 was adopted, Commissioner Kevin J. Martin expressed continuing emphasis on the importance of providing first local service. The community of Owensboro is clearly in need of a first local commercial television station. It had a 2000 U.S. Census population of 54,067. This figure represents a 9.7 percent increase over the 1990 Census population.

Additionally, Owensboro is the county seat and the business center of Daviess County. *Rand-McNally Commercial Atlas and Marketing Guide 1999* at 350. A growing and thriving business and government center such as Owensboro has an immediately evident need for a local commercial television outlet to provide coverage of the needs and interests of its residents.

11. Furthermore, the overall impact on the DTV transition of making the requested channel change and granting the Pappas application as requested would be negligible, at most. As the Commissioners recognized at the December 12, 2001, Open Meeting, the lower 700 MHz band is already quite crowded with incumbent broadcasters. Thus, the addition of one more station in that band would be of no perceptible consequence. Furthermore, this is not an instance in which modification of the allotted channel as requested would then lead to further delays before a construction permit could be granted. Rather, since there is a settlement between the only two applicants, the Commission could proceed directly to grant of a construction permit. The permittee would then be able to move forward to provide much-needed service to the community of Owensboro in an expeditious manner.


12. Of equal importance, it must be remembered that the Settlement Agreement in this case was reached and filed with the Commission during the statutory settlement period established in the Balanced Budget Act of 1997. Section 309(l) was added to the

Communications Act of 1934, as amended, by Section 3002(a) of the Balanced Budget Act. Section 309(l) directs the Commission to “waive *any* provisions of its regulations necessary” to permit settlements between mutually exclusive broadcast applications to go forward during the 180-day period beginning on the date of the enactment of the Balanced Budget Act. 47 U.S.C. §309(l) (emphasis added). The Pappas/SCCC Settlement Agreement is expressly contingent upon grant of the Pappas application with no condition materially adverse to Pappas. As set forth above and in the “Petition for Rulemaking,” such a grant cannot come to pass unless the Commission modifies the channel specified for Owensboro. Since the Settlement Agreement, therefore, cannot be effectuated without the requested change in channel, the Commission is statutorily bound to waive its rules and policies as necessary to permit the change in channel so that Pappas and SCCC may go forward with the agreement to remove the mutual exclusivity between their application. There has been no showing that the amended proposal does not comport with the Commission’s technical rules. Thus, the only matters which must be waived are procedural rules of the type that Congress, through the Balanced Budget Act, directed should be waived in order to allow for the provision of new service. In this instance such a result would further serve the public interest by allowing the commencement of a first local commercial television service in the community of Owensboro.

WHEREFORE, the premises considered, Pappas and SCCC hereby respectfully request that the Commission reconsider its Letter Decision and grant their "Petition for Rulemaking," as amended.

Respectfully submitted,

PAPPAS TELECASTING OF AMERICA,
A CALIFORNIA LIMITED PARTNERSHIP

By: 
Vincent J. Curtis, Jr.
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December 20, 2001

AGC #149 petrecownsb pap

EXHIBIT 1

Exhibit E-Eng-1
Engineering Statement
Ch 47 Owensboro, KY
Petition for Reconsideration
prepared by Wes, Inc. Broadcast Consultants

I, Jim McPhetridge III, declare and state as follows:

I am an engineer with the firm of Wes, Inc. Wes, Inc. acted as engineering consultants in connection with the preparation and filing of the Pappas Telecasting of America, A California Limited Partnership, application for construction permit for a new television station at Owensboro, KY File No. 19960722KL. Due to the fact that the modification window for pending NTSC applications was closing on July 17, 2000, we did an exhaustive engineering analysis on Pappas Telecasting's pending application for Channel 48 in Owensboro, KY. A Rulemaking proposal for Channel 47 was submitted. As part of our engineering argument, we submitted an FLR Exhibit running against WAVE-DT and its Allotment using our own OET 69 program running identical to the Commission's OET 69 Sun Computer program that was in use at that time. We came up with results that demonstrated that the Pappas proposal was creating less than the De-minimus amount of interference allowed.

During the modification window there were certain incompatibility problems dealing with the FCC engineering database, mainly obtaining database files that current information could be extracted from in an intelligent manner, that have further complicated this situation. Therefore, even if a particular item had been in the database, it is entirely possible that we would have been unable to find it.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 19th day of December, 2001.

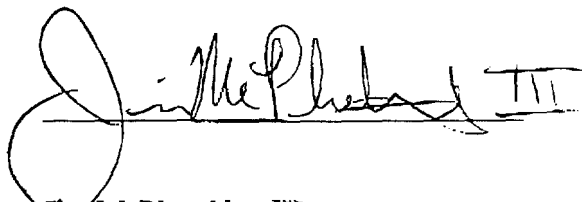

Jim McPhetridge III

EXHIBIT 2

**ENGINEERING STATEMENT
RESPONSE TO COMMISSION'S LETTER (2-A726)
RE: PROPOSED ALLOTMENT OF NTSC CHANNEL 47 AT
OWENSBORO, KENTUCKY**

DECEMBER 2001

**COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.**

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

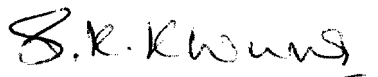
Sudhir K. Khanna, being duly sworn upon his oath, deposes and states:

That he is a registered professional engineer in the District of Columbia, holds the degree of Master of Science in Electrical Engineering, and is Secretary-Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio-Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

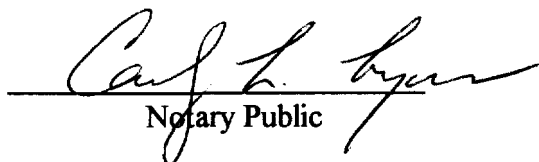
That the attached engineering report was prepared by him or under his supervision and direction; and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.



Sudhir K. Khanna
District of Columbia
Professional Engineer
Registration No. 8057

Subscribed and sworn to before me this 19th day of December, 2001.


Notary Public

My Commission Expires:

2/28/2003

This engineering statement has been prepared on behalf of Pappas Telecasting of America, A California Limited Partnership (Pappas), in response to the Commission's letter (Reference No. 2-A726) dated November 20, 2001 concerning the proposed substitution of NTSC Channel 47 for Channel 48 at Owensboro, Kentucky.

Pappas had filed an application (BPCT-19960722KL) for a new analog TV station at Owensboro, Kentucky to operate on the allotted TV Channel 48 with 5000 kW effective radiated power (ERP) and 286 meters antenna height above average terrain (HAAT). Because of conflicts with the proposed digital TV (DTV) operations, Pappas requested the Commission to initiate a rule making petition to substitute NTSC Channel 47 for the allotted Channel 48. Pappas proposed to operate on NTSC Channel 47(+) with 5000 kW ERP and 284 meters HAAT using a directional TV antenna (File No. BPRM20000717ADR).

In its letter (Reference No. 2-A726) the Commission states that the proposed allotment of Channel 47 would cause 0.7 percent interference to the Channel 47 DTV allotment and 1.6 percent interference to the modification application (BMCDT-20000501AFG) of station WAVE-DT at Louisville, Kentucky. In addition, the Pappas proposal would also cause interference to Class A low power TV (LPTV) station W54AE, Paducah, Kentucky based on contour overlap.

The Commission further states that applicants for new full-service TV stations were required to file amendments to their proposal to eliminate any technical conflicts by July 17, 2000.

Pappas has made engineering studies to determine whether its proposed operation on Channel 47 would cause interference to Class A LPTV station W54AE, Paducah, Kentucky. Station

W54AE, currently licensed to operate on Channel 54, has been granted a construction permit on Channel 47(-) to operate with 1.6 kW ERP and 219.7 meters antenna radiation center above mean sea level. W54AE antenna site is located 168 km southwest from the proposed Pappas Channel 47 TV antenna site. Pappas' study indicates there may be prohibited overlap of pertinent contours between Channel 47 Owensboro TV operation and the authorized operation of LPTV station W54AE. However, the attached terrain profile and radio shadow map clearly shows there would be no line-of-sight transmission between the Channel 47 Owensboro TV station and the W54AE service area due to the intervening terrain. Therefore, Pappas has conducted further studies according to Section 74.705(e) of the Commission's rules to determine the extent of interference using the FCC OET Bulletin 69. The attached OET Bulletin 69 study shows the proposed Channel 47 TV operation at Owensboro, Kentucky, would not cause any harmful interference to the authorized operation of W54AE.

With respect to protection of DTV station WAVE-DT, Pappas would like to point out that prior to July 17, 2000, the software to conduct OET Bulletin 69 studies was not readily available which would provide consistent results. A user friendly version of the software was under development and required further refinement to provide consistent results. Some of the technical studies conducted prior to July 17, 2000, did not yield results which would match with the results obtained by the Commission's staff. In addition, the Commission was in the process of converting its TV database from a flat file to a relational file format known as Consolidated Data Base System (CDBS). During this process,

numerous database errors in the CDBS system were reported. This further limited the capability of making accurate OET Bulletin 69 studies.

results.txt
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 12-03-2001 Time: 14:26:47

Record Selected for Analysis

NEW BPRM -20000717ADR OWENSBORO KY US
Channel 47 ERP 5000 kw HAAT 284 m RCAMSL 00408 m
Latitude 38 -6 -0 Longitude 87 -18-0
Status ADD Zone 2 Border Offset +
Last update Cutoff date Docket
Comments
Applicant

Cell size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kw)	HAAT (m)	64.7 dBu F(50,50) (km)
0.0	1728.720	256.8	68.6
45.0	240.901	268.5	56.6
90.0	237.620	276.4	57.0
135.0	3148.211	281.7	75.2
180.0	4880.720	286.5	79.4
225.0	4072.531	281.0	77.2
270.0	4204.445	280.1	77.4
315.0	4935.211	270.6	77.7

Evaluation toward Class A Stations

Contour overlap to Class A station
W54AE 47 PADUCAH KY OTHER SKK309
D/U ratio at contour 18.8 dB
Offset Proposed + Offset Class A - Required D/U ratio: 28.0
Radial 0.0 degrees
Bearing to point on contour 227.8 degrees
D/U ratio at contour 18.6 dB
Radial 10.0 degrees
Bearing to point on contour 227.4 degrees
D/U ratio at contour 18.4 dB
Radial 20.0 degrees
Bearing to point on contour 226.8 degrees
D/U ratio at contour 18.3 dB
Radial 30.0 degrees
Bearing to point on contour 226.3 degrees
D/U ratio at contour 18.2 dB
Radial 40.0 degrees
Bearing to point on contour 225.6 degrees
D/U ratio at contour 18.2 dB
Radial 50.0 degrees
Bearing to point on contour 225.0 degrees
D/U ratio at contour 18.3 dB

results.txt

Radial 60.0 degrees
Bearing to point on contour 224.4 degrees
D/U ratio at contour 18.5 dB
Radial 70.0 degrees
Bearing to point on contour 223.9 degrees
D/U ratio at contour 18.7 dB
Radial 80.0 degrees
Bearing to point on contour 223.5 degrees
D/U ratio at contour 18.9 dB
Radial 90.0 degrees
Bearing to point on contour 223.2 degrees
D/U ratio at contour 19.2 dB
Radial 100.0 degrees
Bearing to point on contour 223.1 degrees
D/U ratio at contour 19.5 dB
Radial 110.0 degrees
Bearing to point on contour 223.1 degrees
D/U ratio at contour 19.8 dB
Radial 120.0 degrees
Bearing to point on contour 223.2 degrees
D/U ratio at contour 20.0 dB
Radial 130.0 degrees
Bearing to point on contour 223.6 degrees
D/U ratio at contour 20.2 dB
Radial 140.0 degrees
Bearing to point on contour 224.2 degrees
D/U ratio at contour 20.3 dB
Radial 150.0 degrees
Bearing to point on contour 224.6 degrees
D/U ratio at contour 20.4 dB
Radial 160.0 degrees
Bearing to point on contour 224.6 degrees
D/U ratio at contour 20.5 dB
Radial 170.0 degrees
Bearing to point on contour 224.5 degrees
D/U ratio at contour 20.6 dB
Radial 180.0 degrees
Bearing to point on contour 224.6 degrees
D/U ratio at contour 20.7 dB
Radial 190.0 degrees
Bearing to point on contour 224.7 degrees
D/U ratio at contour 20.6 dB
Radial 200.0 degrees
Bearing to point on contour 225.0 degrees
D/U ratio at contour 20.6 dB
Radial 210.0 degrees
Bearing to point on contour 225.2 degrees
D/U ratio at contour 20.8 dB
Radial 220.0 degrees
Bearing to point on contour 225.3 degrees
D/U ratio at contour 21.1 dB
Radial 230.0 degrees
Bearing to point on contour 225.5 degrees
D/U ratio at contour 21.3 dB
Radial 240.0 degrees
Bearing to point on contour 225.9 degrees
D/U ratio at contour 21.3 dB
Radial 250.0 degrees
Bearing to point on contour 226.3 degrees
D/U ratio at contour 21.3 dB
Radial 260.0 degrees
Bearing to point on contour 226.7 degrees
D/U ratio at contour 21.2 dB

results.txt

Radial 270.0 degrees
 Bearing to point on contour 227.1 degrees
 D/U ratio at contour 21.1 dB
 Radial 280.0 degrees
 Bearing to point on contour 227.6 degrees
 D/U ratio at contour 20.9 dB
 Radial 290.0 degrees
 Bearing to point on contour 228.0 degrees
 D/U ratio at contour 20.7 dB
 Radial 300.0 degrees
 Bearing to point on contour 228.3 degrees
 D/U ratio at contour 20.4 dB
 Radial 310.0 degrees
 Bearing to point on contour 228.6 degrees
 D/U ratio at contour 20.0 dB
 Radial 320.0 degrees
 Bearing to point on contour 228.6 degrees
 D/U ratio at contour 19.7 dB
 Radial 330.0 degrees
 Bearing to point on contour 228.6 degrees
 D/U ratio at contour 19.3 dB
 Radial 340.0 degrees
 Bearing to point on contour 228.4 degrees
 D/U ratio at contour 19.0 dB
 Radial 350.0 degrees
 Bearing to point on contour 228.2 degrees

Class A Evaluation Complete

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

 Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN	
47	NEW	OWENSBORO KY	BPRM	20000717ADR

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
47	W54AE	PADUCAH KY	167.9	CP	OTHER -SKK309

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

results.txt

Channel	Call	City/State	Application	Ref. No.
47	W54AE	PADUCAH KY	OTHER	-SKK309

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WSIU-TV	CARBONDALE IL	130.3	CP	BPEDT	-20000428ACV
40	WSIU-DT	CARBONDALE IL	130.4	PLN	DTVPLN	-DTVP1061
44	WEVV	EVANSVILLE IN	136.2	LIC	BLCT	-19831207KF
45	WEVV	EVANSVILLE IN	136.2	CP	BPCDT	-19991101AEQ
45	WEVV-DT	EVANSVILLE IN	136.2	PLN	DTVPLN	-DTVP1233
45	960723LA	SIKESTON MO	91.2	APP	BPCT	-19960723LA
46	960116KK	GOSNELL AR	172.7	APP	BPCT	-19960116KK
46	WFIE-TV	EVANSVILLE IN	137.7	CP	BPCDT	-19991101AFB
46	WFIE-DT	EVANSVILLE IN	137.7	PLN	DTVPLN	-DTVP1260
46	WNPT	NASHVILLE TN	195.6	CP	BPEDT	-20000403AAU
46	WDCN-DT	NASHVILLE TN	195.6	PLN	DTVPLN	-DTVP1275
47	WHSL-DT	EAST ST. LOUIS IL	221.3	PLN	DTVPLN	-DTVP1294
47	WBXI-CA	INDIANAPOLIS IN	373.8	LIC	BLTTL	-20000211AAQ
47	WAVE	LOUISVILLE KY	288.7	CP MOD	BMPCDT	-20000501AFG
47	WAVE-DT	LOUISVILLE KY	324.5	PLN	DTVPLN	-DTVP1295
47	NEW	OWENSBORO KY	167.9	ADD	BPRM	-20000717ADR
47	OWENS47	OWENSBORO KY	167.9	RM	OTHER	-SKK304
47	WDEF-TV	CHATTANOOGA TN	365.3	CP	BPCDT	-19991025ACX
47	WDEF-DT	CHATTANOOGA TN	365.3	PLN	DTVPLN	-DTVP1306
47	WLJT	LEXINGTON TN	147.6	CP	BPEDT	-20000501AHI
47	WLJT-DT	LEXINGTON TN	147.6	PLN	DTVPLN	-DTVP1307
48	WKGB-TV	BOWLING GREEN KY	178.6	CP	BPEDT	-20000215AAC
48	WKGB-DT	BOWLING GREEN KY	178.6	PLN	DTVPLN	-DTVP1325
48	960722KL	OWENSBORO KY	158.2	APP	BPCT	-19960722KL
48	960920IV	OWENSBORO KY	158.2	APP	BPCT	-19960920IV
49	WDKA	PADUCAH KY	48.1	LIC	BLCT	-19970616KF
50	WDKA	PADUCAH KY	48.1	CP	BPCDT	-19991029ACT
50	WDKA-DT	PADUCAH KY	48.1	PLN	DTVPLN	-DTVP1378

Total scenarios = 1

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 47N KY PADUCAH	OTHER	SKK309	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	45909	164.2	
not affected by terrain losses	45412	160.2	
lost to NTSC IX	919	8.0	
lost to additional IX by ATV	0	0.0	
lost to all IX	919	8.0	

Potential Interfering Stations Included in above Scenario 1

47N KY OWENSBORO	OTHER	SKK304	RM
47A TN LEXINGTON	DTVPLN	DTVP1307	PLN

After Analysis

Results for: 47N KY PADUCAH	OTHER	SKK309	CP
	POPULATION	AREA (sq km)	
within Noise Limited Contour	45909	164.2	
not affected by terrain losses	45412	160.2	
lost to NTSC IX	919	8.0	
lost to additional IX by ATV	0	0.0	

results.txt
919

Potential Interferring Stations Included in above Scenario 1

47N KY OWENSBORO	OTHER	SKK304	RM
47A TN LEXINGTON	DTVPLN	DTVP1307	PLN
47N KY OWENSBORO	BPRM	20000717ADR	ADD

#####

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

Site: OWENSBORO CH. 47
 N 38 6 0 W 87 18 0
 Ant. Elev. (AMSL): 408.0 m
 Path azimuth: 225.36 degs.

Frequency: 668.0 MHz
 Path Length: 168.0 km
 Total Path Loss: 199.4 dB
 Excess Path Loss: 66.0 dB

Site: W54AE
 N 37 1 50 W 88 38 48
 Ant. Elev. (AMSL): 123.0 m
 Path azimuth: 44.54 degs.



K factor: 1.333

3 Second Database - NAD 27
 Rain loss: .0 dB
 Urban loss: .0 dB
 Foliage loss: .0 dB

COHEN, DIPPELL & EVERIST
 Consulting Engineers
 WASHINGTON, D.C.

PATH PROFILE

DCMEBER 2001

